

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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SETH D. HARRIS, Acting Secretary of	:	
Labor, United States Department of	:	
Labor,	:	
	:	
Plaintiff,	:	Civil Action No.
	:	12-CV-1511 (CM) (GWG)
v.	:	
	:	
JOHN V. MCNAMEE, JR., KEVIN DUNPHY,	:	APPLICATION OF
MANUEL FARINA, JOHN T. HALL, JOHN	:	INDEPENDENT
HAMILTON, MICHELE SULLIVAN, JOHN	:	FIDUCIARY FOR FEES
WALSH, EXHIBITION EMPLOYEES LOCAL	:	FOR SERVICES IN
829 I.A.T.S.E. PENSION PLAN, EXHIBITION	:	JUNE THROUGH
EMPLOYEES LOCAL 829 I.A.T.S.E. ANNUITY	:	AUGUST 2023
FUND, and EXHIBITION EMPLOYEES LOCAL	:	
829 I.A.T.S.E. VACATION FUND,	:	
	:	
Defendants.	:	

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JUDITH P. BROACH, under penalty of perjury, pursuant to
28 U.S.C. §1746, declares the following to be true and correct:

1. Pursuant to this Court's Partial Consent Order ("the Order"), filed on May 2, 2012, the undersigned was appointed Independent Fiduciary of the Exhibition Employees Local 829 I.A.T.S.E. Pension Fund ("the Pension Fund"), the Exhibition Employees Local 829 I.A.T.S.E. Annuity Fund ("the Annuity Fund") and the Exhibition Employees Local 829 I.A.T.S.E. Vacation Fund ("the Vacation Fund") (collectively, "the Funds"). Under the terms of the Order, the Independent Fiduciary's appointment was for an initial term of 120 days. By this Court's Second Partial Consent Order ("the Second Order"), filed on September 4, 2012, the Independent Fiduciary's term was extended for an additional

120 days. On June 28, 2013, this Court filed its Consent Order and Judgment ("the Judgment"). Pursuant to the Judgment, the Independent Fiduciary's term was continued for an indefinite period.

2. The Judgment provides, at paragraph "12," that the Independent Fiduciary's responsibilities include "plenary authority to administer the Funds" and "other activities required to ensure the prudent and sound administration of the Funds." Because it no longer had any contributing employers, the Independent Fiduciary terminated the Vacation Fund effective June 30, 2015. On or about December 14, 2015, after all benefit and administrative expense obligations of the Vacation Fund were paid, the Independent Fiduciary filed a final Form 5500 with the Internal Revenue Service and U.S. Department of Labor on behalf of that Fund.

3. As is more fully described in the Independent Fiduciary's Report to the Court, dated January 6, 2023, due to a long decline in the number of Union members for whom contributions were made to the Annuity Fund, which was exacerbated by the Covid-19 pandemic, the Independent Fiduciary terminated the Annuity Fund effective July 30, 2021. Thereafter, all participants received their full account balances either directly, by payment to their designated IRAs, or by payment of the account balance to the Pension Benefit Guaranty Corporation's missing participant program. On December

31, 2022, after paying all administrative expense obligations of the Annuity Fund, a final payment was made to all participants of their pro-rata share of the small excess then remaining in the Annuity Fund. A Form 5310 Application for Determination upon Termination of Qualified Plan has been filed with the Internal Revenue Service. A final Form 5500 was filed with the Internal Revenue Service and the U.S. Department of Labor on September 28, 2023. Because the Annuity Fund no longer has any assets, all services rendered or which will be rendered by the Independent Fiduciary to the Annuity Fund after December 1, 2022, are without compensation. Accordingly, this application does not, and future applications will not request fees for any services rendered to that Fund.

4. Pursuant to paragraph "19" of the Judgment, the Independent Fiduciary is to be compensated at the rate of \$295 per hour for all attorney time and \$85 per hour for paralegal time. Applications for such fees are to be filed quarterly. By Order of this Court, dated August 11, 2022, the Independent Fiduciary's compensation was increased to \$350 per hour. Application for such fees is to be filed quarterly.

5. The Independent Fiduciary hereby respectfully requests that she be compensated by the Pension Fund for services rendered in this matter during the months of June 2023 through August 2023 and that the firm of Stulberg & Walsh, LLP be compensated by the Pension Fund for services rendered and

expenses incurred in this matter during the months of December 2022 through August 2023, as follows:

\$5,499.33 to Stulberg & Walsh, LLP
\$8,015.00 to the Independent Fiduciary

for total fees and expenses of \$13,514.33 for said months.

As with fee applications in this matter since 2017, this application contains separate bills for Stulberg & Walsh, LLP and the Independent Fiduciary. As explained in my application of July 5, 2017, effective April 1, 2017, the Independent Fiduciary is no longer a partner or employee of the firm formerly known as Broach & Stulberg, LLP. While the Independent Fiduciary maintains an Of Counsel arrangement with Stulberg & Walsh, and has retained that firm to continue to perform collections services for the Funds, she is no longer compensated through that firm. Accordingly, effective April 1, 2017, the Independent Fiduciary and Stulberg & Walsh must be compensated separately for services on behalf of the Funds.

6. In support of this application, the Independent Fiduciary has attached hereto three print-outs from Stulberg & Walsh's time and billing computer program. The first print-out details services performed by the Independent Fiduciary on behalf of the Pension Fund. The second print-out details services performed by Stulberg & Walsh, LLP, on behalf of the Pension Fund. The third print-out details services performed by Stulberg & Walsh, LLP, which relate to an action to collect

delinquent contributions owed to the Pension Fund.

WHEREFORE, for the foregoing reasons, I respectfully request that the Court grant the Independent Fiduciary's application for fees for her services rendered during the period June 1, 2023 through August 31, 2023, and for the services rendered and costs incurred by Stulberg & Walsh, LLP during the period December 1, 2022 through August 31, 2023, in its entirety.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 2, 2023

A handwritten signature in blue ink, appearing to read "Judith P. Broach", is written over a horizontal line.

Judith P. Broach



September 29, 2023

Local 829 I.A.T.S.E. PF-Service as Independent Fid

For Legal Services Rendered June 1, 2023 through August 31, 2023

Re: Local 829 I.A.T.S.E. Pension Fund -
Service as Independent Fiduciary

Our file number : 815-001--A

Attorneys/Legal Assistants' Services:

			<u>Hrs/Rate</u>	<u>AMOUNT</u>
06/01/23	JPB	E-mails with J. Harney, Esq. (2); review e-mails from J. Harney, Esq. (2)	0.30 \$350.00/hr	105.00
	JPB	Review e-mail from K. Duffie	0.10 \$350.00/hr	35.00
06/02/23	JPB	Review e-mail and attachment from B. Francella	0.20 \$350.00/hr	70.00
	JPB	Review e-mail from J. Harney, Esq.	0.10 \$350.00/hr	35.00
06/05/23	JPB	Telephone call with G. Moore, Esq.	0.30 \$350.00/hr	105.00
	JPB	E-mails with G. Riccardella	0.20 \$350.00/hr	70.00
06/06/23	JPB	Edit second draft of withdrawal liability policy; e-mail with J. Harney, Esq. re same	0.50 \$350.00/hr	175.00
	JPB	Review e-mail from J. Kleiman; e-mail with J. Kleiman	0.10 \$350.00/hr	35.00
06/07/23	JPB	Telephone call with G. Moore, Esq.	0.10 \$350.00/hr	35.00

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Local 829 I.A.T.S.E. PF-Service as Independent Fiduciary

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
06/08/23	JPB	Review e-mail from J. Kleiman and attached 2/1/22 actuarial valuation	0.50 \$350.00/hr	175.00
	JPB	Review e-mail and attachments (3) from S. Schneider; e-mail with S. Schneider	0.20 \$350.00/hr	70.00
	JPB	Review e-mail from J. Harney, Esq. and attached Segal changes to draft withdrawal liability policy; e-mail with J. Harney, Esq.	0.40 \$350.00/hr	140.00
06/12/23	JPB	Prepare for and conduct meeting of Independent Fiduciary with Fund's professional advisors	1.70 \$350.00/hr	595.00
	JPB	Review e-mail from K. Duffie; e-mail with K. Duffie	0.20 \$350.00/hr	70.00
	JPB	Sign and transmit withdrawal liability policy	0.10 \$350.00/hr	35.00
	JPB	Review e-mails from J. Harney, Esq. (2); e-mails with J. Harney, Esq. (2)	0.20 \$350.00/hr	70.00
06/13/23	JPB	Review e-mail and attachment from S. Schneider; e-mail with S. Schneider	0.20 \$350.00/hr	70.00
06/14/23	JPB	Telephone call with G. Moore, Esq.	0.10 \$350.00/hr	35.00
06/15/23	JPB	Review e-mail and attachment from G. Riccardella	0.30 \$350.00/hr	105.00
	JPB	Review e-mail from J. Harney, Esq.; e-mail with J. Harney, Esq.	0.20 \$350.00/hr	70.00
06/16/23	JPB	Review e-mails from J. Harney, Esq., J. Kleiman	0.20 \$350.00/hr	70.00
06/20/23	JPB	Review e-mails from J. Kleiman (2), J. Harney, Esq.	0.30 \$350.00/hr	105.00
06/21/23	JPB	Telephone call with participant R. Pressman	0.30 \$350.00/hr	105.00
06/22/23	JPB	Review e-mails from J. Kleiman (2); e-mail with J. Kleiman	0.20 \$350.00/hr	70.00
	JPB	Telephone call with G. Moore, Esq.	0.40 \$350.00/hr	140.00

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
06/22/23	JPB	Review e-mail from G. Moore, Esq.; e-mail with G. Moore, Esq.	0.30 \$350.00/hr	105.00
06/23/23	JPB	Prepare fee application and proposed order	0.30 \$350.00/hr	105.00
06/26/23	JPB	Review manual checks, pre-check register and reconciliation report for July benefit payments; e-mail with S. Schneider re same	0.30 \$350.00/hr	105.00
06/30/23	JPB	Review e-mail from pensioner C. Curley; e-mail with C. Curley	0.10 \$350.00/hr	35.00
	JPB	Review e-mail from participant R. Pressman	0.10 \$350.00/hr	35.00
07/01/23	JPB	E-mail with participant Robert Pressman	0.10 \$350.00/hr	35.00
	JPB	E-mail with G. Moore, Esq.	0.10 \$350.00/hr	35.00
07/12/23	JPB	Telephone call with G. Moore, Esq.	0.10 \$350.00/hr	35.00
07/19/23	JPB	Review e-mail from G. Moore, Esq.; review R. Pressman Social Security Earnings Statement; e-mails with G. Moore, Esq., R. Pressman	0.40 \$350.00/hr	140.00
07/20/23	JPB	Review manual checks, pre-check register and reconciliation report for August benefit payments; e-mail with S. Schneider re same	0.40 \$350.00/hr	140.00
	JPB	Review e-mail and attachment from Reynolds Consulting	0.30 \$350.00/hr	105.00
	JPB	Telephone call with G. Moore, Esq.	0.30 \$350.00/hr	105.00
07/25/23	JPB	Review e-mail and attachment from J. Kleiman	0.50 \$350.00/hr	175.00
07/26/23	JPB	E-mail with J. Harney, Esq.	0.10 \$350.00/hr	35.00
	JPB	Telephone call with G. Moore, Esq.	0.20 \$350.00/hr	70.00

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
07/26/23	JPB	E-mail with G. Moore, Esq.	0.50 \$350.00/hr	175.00
	JPB	E-mail with R. Pressman	0.10 \$350.00/hr	35.00
07/27/23	JPB	Telephone call with J. Harney, Esq.	0.80 \$350.00/hr	280.00
	JPB	Review e-mail and attachments (18) from G. Riccardella	0.50 \$350.00/hr	175.00
07/31/23	JPB	Review e-mails from G. Moore, Esq., G. Riccardella re bills for professional services; e-mail with G. Riccardella re same	0.10 \$350.00/hr	35.00
	JPB	Review e-mails from J. Harney, Esq. (2); e-mails with J. Harney, Esq.	0.10 \$350.00/hr	35.00
	JPB	Review 9 bills for professional services; e-mail with G. Riccardella re same	0.30 \$350.00/hr	105.00
08/01/23	JPB	Review invoices for professional services; e-mails with G. Moore, Esq. (3); J. Harvey, Esq. (2) and G. Riccardella re same; review e-mails from J. Harvey, G. Riccardella	0.90 \$350.00/hr	315.00
	JPB	Review e-mail from G. Moore, Esq.; telephone call with G. Moore, Esq.	0.40 \$350.00/hr	140.00
08/03/23	JPB	Telephone call with G. Moore, Esq.	0.90 \$350.00/hr	315.00
	JPB	Review pension application, work history and credited service worksheet for R. Doherty; e-mail with S. Schneider	0.50 \$350.00/hr	175.00
	JPB	E-mails with G. Moore, Esq. (3); review e-mails from G. Moore, Esq. (2)	0.60 \$350.00/hr	210.00
08/04/23	JPB	E-mail with S. Schneider; review e-mail from S. Schneider	0.30 \$350.00/hr	105.00
08/07/23	JPB	Review and edit draft correspondence with R. Doherty; e-mail with S. Schneider re same	0.30 \$350.00/hr	105.00

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
08/07/23	JPB	Review e-mail from G. Moore, Esq.; e-mail with G. Moore, Esq.	0.20 \$350.00/hr	70.00
08/09/23	JPB	E-mail with G. Riccardella	0.10 \$350.00/hr	35.00
	JPB	Review e-mail and attachment from G. Moore, Esq.	0.20 \$350.00/hr	70.00
08/10/23	JPB	Edit draft minutes of June 12 meeting of Independent Fiduciary and Fund's professional advisors	1.10 \$350.00/hr	385.00
	JPB	Telephone call with G. Moore, Esq.	0.30 \$350.00/hr	105.00
	JPB	E-mail with G. Moore, Esq.	0.30 \$350.00/hr	105.00
08/12/23	JPB	Review proposed e-mail to J. Hubicki	0.20 \$350.00/hr	70.00
08/15/23	JPB	Edit proposed e-mail to J. Hubicki; e-mails with G. Moore, Esq. (2)	0.70 \$350.00/hr	245.00
08/16/23	JPB	E-mail with G. Riccardella; review e-mail and attachments (5) from G. Riccardella	0.30 \$350.00/hr	105.00
08/18/23	JPB	Review G. Moore, Esq. edits to draft June minutes	0.10 \$350.00/hr	35.00
	JPB	E-mail with J. Harney, Esq.; review e-mail from J. Harney, Esq.	0.10 \$350.00/hr	35.00
	JPB	E-mail with J. Kleiman and K. Duffie	0.10 \$350.00/hr	35.00
08/21/23	JPB	E-mail with G. Moore, Esq.; review e-mail from G. Moore, Esq.	0.20 \$350.00/hr	70.00
	JPB	Review e-mail from K. Duffie	0.10 \$350.00/hr	35.00
08/22/23	JPB	Review e-mails from K. Duffie (2)	0.10 \$350.00/hr	35.00
	JPB	Review e-mail from J. Harney, Esq.; e-mail with J. Harney, Esq.	0.10 \$350.00/hr	35.00

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
08/23/23	JPB	Review manual checks, pre-check register and reconciliation report for September benefit payments; e-mail with S. Schneider re same	0.30 \$350.00/hr	105.00
08/24/23	JPB	E-mails with G. Moore, Esq. (3); telephone call with G. Moore, Esq.	0.50 \$350.00/hr	175.00
08/25/23	JPB	Review invoices for professional services; e-mail with G. Ricardella re same	0.30 \$350.00/hr	105.00
	JPB	E-mail with J. Harney, Esq	0.20 \$350.00/hr	70.00
	JPB	Review e-mail from J. Kleiman	0.10 \$350.00/hr	35.00
		Professional Services Rendered:	<u>22.90</u>	<u>\$8,015.00</u>



September 29, 2023

Local 829 I.A.T.S.E. PF-Service as Independent Fid

For Legal Services Rendered December 1, 2022 through August 31, 2023

Re: Local 829 I.A.T.S.E. Pension Fund -
Service as Independent Fiduciary

Our file number : 815-001

Attorneys/Legal Assistants' Services:

			<u>Hrs/Rate</u>	<u>AMOUNT</u>
03/01/23	PJW	Edit minutes	0.20 \$295.00/hr	59.00
03/16/23	YRJ	Edit National Convention Services complaint	0.30 \$295.00/hr	88.50
	PJW	Edit revised complaint	0.20 \$295.00/hr	59.00
03/17/23	YRJ	E-mail with G. Pahhas	0.30 \$295.00/hr	88.50
	YRJ	Review interest rate used for calculation	0.40 \$295.00/hr	118.00
	PJW	Review discrepancy in interest rate percentage between CBA and Delinquency procedures	0.20 \$295.00/hr	59.00
	PJW	E-mail with G. Pahhas re updated interest calculation	0.20 \$295.00/hr	59.00
03/20/23	YRJ	Edit National Convention Services complaint	0.80 \$295.00/hr	236.00
	PJW	Prepare for Quarterly Meeting of Independent Fiduciary with Fund Professional Advisors	0.20 \$295.00/hr	59.00

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Local 829 I.A.T.S.E. PF-Service as Independent Fiduciary

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
03/20/23	PJW	Attend Quarterly meeting	0.40 \$295.00/hr	118.00
	PJW	E-mails with J. Harney re Showtime CBA; review documents	0.30 \$295.00/hr	88.50
	PJW	Review revised National Convention Services complaint	0.20 \$295.00/hr	59.00
04/03/23	YRJ	Follow up with G. Pahhas re interest calculation for National Convention Services	0.10 \$295.00/hr	29.50
	YRJ	Edit National Convention Services complaint	0.50 \$295.00/hr	147.50
	PJW	E-mail with G. Pahhas re interest update for National Convention Services	0.10 \$295.00/hr	29.50
04/04/23	YRJ	Review updated report from G. Pahhas	0.30 \$295.00/hr	88.50
	PJW	Review revised Audit Report for National Convention Services from G. Pahhas	0.20 \$295.00/hr	59.00
	PJW	Review revised complaint for National Convention Services	0.20 \$295.00/hr	59.00
		Professional Services Rendered:	<u>5.10</u>	<u>\$1,504.50</u>
		Disbursements:		
04/18/23		Photocopying expense		25.00
05/03/23		Westlaw research		41.03
		Total Disbursements:		<u>\$66.03</u>
		Current charges:		<u><u>\$1,570.53</u></u>



September 29, 2023

Local 829 I.A.T.S.E.- Pension Funds-MES

For Legal Services Rendered December 1, 2022 through August 31, 2023

Re: Local 829 I.A.T.S.E.- Funds-MES

Our file number : 815-006

Attorneys/Legal Assistants' Services:

			<u>Hrs/Rate</u>	<u>AMOUNT</u>
12/02/22	JLD	Follow up with Albany-based process server to serve notice of deposition on Metropolitan Exposition Services	0.20 \$295.00/hr	59.00
12/05/22	JLD	Telephone call with process server	0.10 \$295.00/hr	29.50
12/08/22	JLD	Prepare Notices of Deposition and Documents for depositions	2.20 \$295.00/hr	649.00
12/10/22	PJW	Review e-mail from counsel for B. Lax, Metropolitan Exposition Principal	0.10 \$295.00/hr	29.50
12/12/22	JLD	Follow up on service of process	0.10 \$295.00/hr	29.50
01/10/23	JLD	E-mail with B. Lax with notices of deposition	0.40 \$295.00/hr	118.00
01/11/23	JLD	E-mail with MES Principal M. Glynn re deposition	0.20 \$295.00/hr	59.00
01/12/23	JLD	Logistics coordination with court reporter service for deposition; prepare exhibits	1.20 \$295.00/hr	354.00
	JLD	Prepare statement for PJW to read into the record	0.50 \$295.00/hr	147.50

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Local 829 I.A.T.S.E.- Pension Funds-MES

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
01/12/23	PJW	Prepare for deposition of MES officer	0.40 \$295.00/hr	118.00
01/13/23	JLD	Deposition of MES representative (did not appear) (courtesy discount 1.0)	\$295.00/hr	NO CHARGE
	PJW	Prepare for deposition of MES officer	0.30 \$295.00/hr	88.50
	PJW	Appear at deposition	0.40 \$295.00/hr	118.00
03/10/23	JLD	Prepare subpoena for B. Lax deposition	0.30 \$295.00/hr	88.50
	OS	Factual investigation re MES Principal B. Lax	0.30 \$85.00/hr	25.50
03/14/23	JLD	E-mails to M. Glynn and B. Lax re subpoena	0.30 \$295.00/hr	88.50
03/16/23	JLD	Review Rule 45 subpoena requirements	0.40 \$295.00/hr	118.00
	PJW	Review Rule 69 re post judgment discovery	0.10 \$295.00/hr	29.50
03/17/23	JLD	Prepare Rule 45 subpoena of B. Lax for deposition	1.50 \$295.00/hr	442.50
03/20/23	OS	Phone call with process server re B. Lax service; e-mail with JLD	0.20 \$85.00/hr	17.00
03/21/23	JLD	Prepare letters to MES principals re depositions	0.30 \$295.00/hr	88.50
03/22/23	JLD	E-mail with process server; finalize B. Lax subpoena; identify NJ process server; prepare cover letter to process server	0.30 \$295.00/hr	88.50
	JLD	Prepare e-mail to A. Maurice, Esq., counsel for B. Lax re depositions	0.20 \$295.00/hr	59.00
	OS	E-mail with process server re B. Lax service	0.40 \$85.00/hr	34.00
	OS	Preparation re service of documents	0.30 \$85.00/hr	25.50
	PJW	E-mails to potential deponents	0.20 \$295.00/hr	59.00

Local 829 I.A.T.S.E.- Pension Funds-MES

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			<u>Hrs/Rate</u>	<u>AMOUNT</u>
04/04/23	PJW	Review notice from process server	0.10 \$295.00/hr	29.50
05/22/23	PJW	Review subpoena for MES Principal M. Glynn	0.20 \$295.00/hr	59.00
06/20/23	JLD	Conference with PJW re next steps	0.10 \$295.00/hr	29.50
	PJW	Conference with JLD re next steps	0.10 \$295.00/hr	29.50
06/30/23	JLD	Prepare and mail follow up letters following deposition no-show (courtesy discount 1.0)	1.20 \$295.00/hr	354.00
08/31/23	JLD	Conference with PJW re next steps on depositing M. Glynn and B. Lax	0.20 \$295.00/hr	59.00
	PJW	Conference with JLD re status	0.20 \$295.00/hr	59.00
		Professional Services Rendered:	<u>13.00</u>	<u>\$3,583.00</u>
		Disbursements:		
03/10/23		Westlaw research		8.75
03/15/23		Westlaw research		6.81
03/16/23		Photocopying expense		2.50
03/17/23		Westlaw research		45.42
03/20/23		Photocopying expense		4.00
03/21/23		Photocopying expense		2.50
		Photocopying expense		6.00
03/22/23		Witness/subpoena fee		98.00
06/29/23		Westlaw research		7.31
06/30/23		Westlaw research		16.18
07/05/23		Westlaw research		140.24
07/06/23		Westlaw research		8.09
		Total Disbursements:		<u>\$345.80</u>

Local 829 I.A.T.S.E.- Pension Funds-MES

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AMOUNT

Current charges:

\$3,928.80